



July 20, 2010

DEBP0172
File: 4444.3

Office of Environmental Stewardship
United States Environmental Protection Agency / Region I – New England
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Attention: Mr. Joseph Canzano, P.E.
Regional Pretreatment, Stormwater & SPCC Compliance Coordinator

Subject: May 6, 2010 Inspection

Dear Mr. Canzano:

Thank you for your letter stamp dated June 25, 2010, detailing the specifics of your inspection of May 6, 2010. It was a pleasure meeting with you and touring the facility; we found it to be very informative and we value your comments, suggestions and recommendations.

The bullets below represent Berkshire Power's responses to the Region's comments, including remedial action and/or future intent:

- Berkshire Power supports the Region's recommendation to perform compliance monitoring for pollutants of concern regulated under 40 CFR, Part 423.17. This is above-and-beyond the facility's permitted requirement to demonstrate compliance via engineering calculations. This testing will be performed every five years.
- Immediately following the May 6th inspection Berkshire Power thoroughly cleaned the automatic waste water sampler. Additionally, the bottle rack was removed, sand-blasted, painted with an epoxy coating, and re-installed. Please see the attached photos of the current condition of the sampler following the remedial work.
- The outfall of the detention basin enters Oil and Water Separator #1 (OWS-1), which is designed to prohibit carry-over of oil to the wetlands. Taking a cautious approach prior to commercial operations of the facility, Berkshire Power installed a valve at the v-notch weir outfall device located in the detention basin. The valve is maintained in the closed position and therefore no storm water has ever been released to OWS-1 and consequently nothing has been released to the wetlands. The capacity of the detention basin, in addition to the surface and subsurface soil consistency lending itself to percolation, sufficiently accommodates all storm water flows to date.

As standing water is very uncommon, discharge to the OWS-1 has never been required; therefore, the valve has never been opened. As a very conservative measure Berkshire Power has since locked the valve in a closed position. Additionally, all maintenance records of the structures and the OWS-1 have and will continue to be maintained.

- The outfalls have been clearly labeled and marked. Please see the attached photos. The design of the detention basin storm water discharge provides for final release of clean storm water effluent to the wetlands which drains to the Worthington Brook. The outfall is on Berkshire Power property, but it is outside of the fence-line. Access is achieved by Shoemaker Lane.
- As seen in the attached photos, Berkshire Power has installed locks on the supply and return (truck transfer) lines, as recommended by the Region.
- As you pointed-out, storm water samples should ideally be collected at the final outfall of the detention basin. As the detention basin percolates, storm water rarely reaches the v-notch weir outfall. As such, Berkshire Power alternatively draws storm water samples at four culverts which represent influent points to the detention basin. This provides representative samples of the final storm water effluent. Pursuant to the Region's recommendation, Berkshire Power may choose to perform visual storm water assessments, in lieu of actual sample collection, as there is no actual discharge. Currently, the facility continues to diligently collect samples at the detention basin influent culverts, but may revert to visuals only; at which point, Berkshire Power will modify the SWPPP and SPCC Plans, describing the change.
- A simplified site plan detailing chemical/oil storage areas, floor drainage and respective OWSs, detention basin capacity, v-notch weir and associated shutoff valve, and POTW designation has been developed. Attached is a reduced version. A color-coded large "C" – sized drawing has been added to the plans. Also, building floor drains have been stenciled, as shown in the attached photo.
- The SPCC Plan has been revised with language explaining that there is no combined sewer overflow outfalls between Berkshire Power's connection to the POTW and the POTW head-works. Essentially, the Berkshire Power effluent sewer connects directly into a main interceptor which connects directly to the municipal treatment facility.

Again, Berkshire Power appreciates your observations and recommendations and has incorporated those comments into its plans, policies and practices, as the facility is committed to operating in the safest and most environmentally compliant nature possible. If questions or comments arise, please contact me anytime at your convenience.

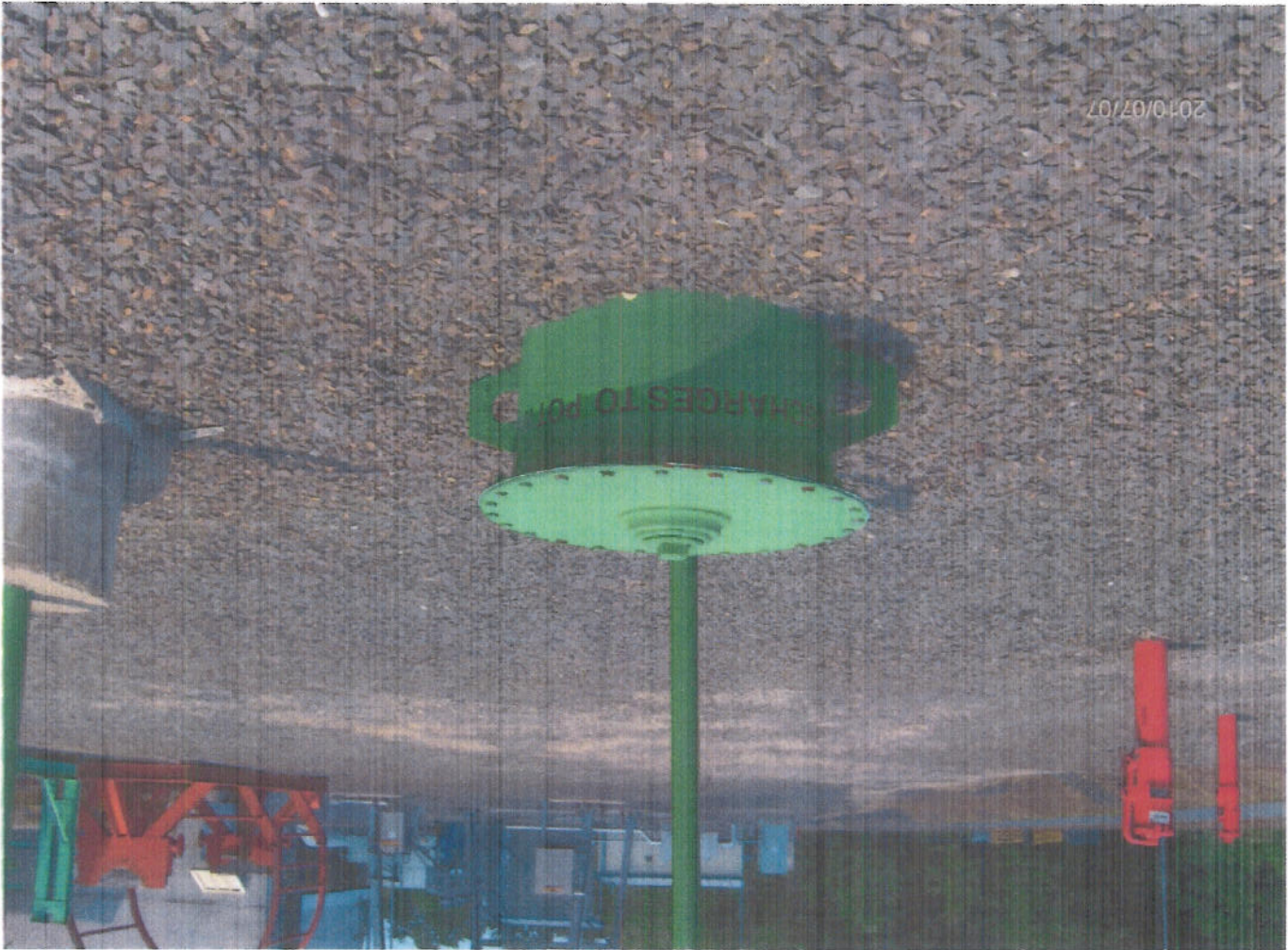
Sincerely,



Frank Basile
General Manager

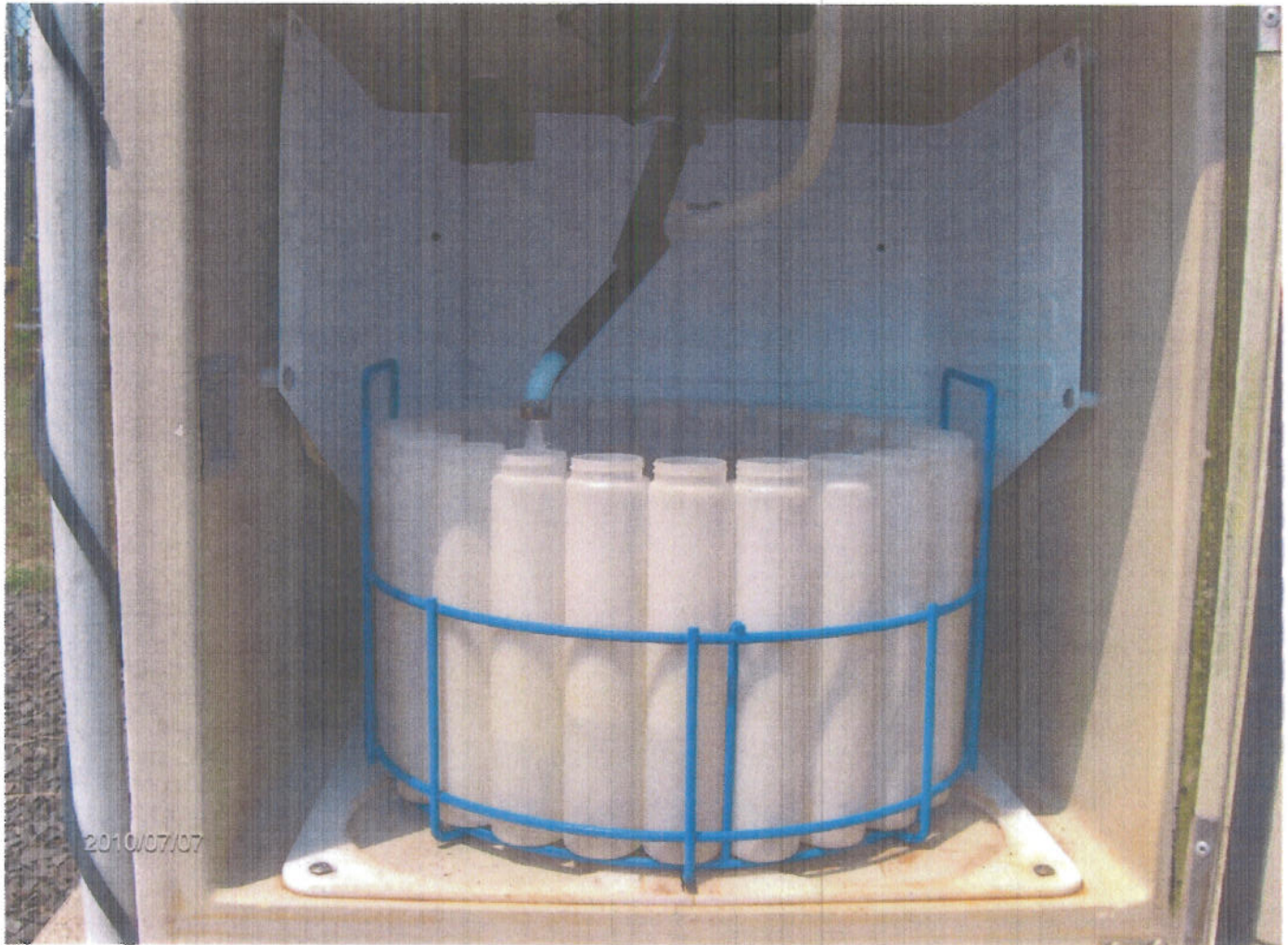
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Attachment

Oil and Water Separator #3 (OWS - 3)



New labeling showing POTW Discharge

Wastewater Sampler



The Wastewater Sampler was cleaned and the bottle rack was removed, sand-blasted and painted.

Detention Basin



The Detention Basin was moved.

V-Notch Weir



The V-Notch Weir with valve isolation was labeled as a restricted outfall.

V-Notch Weir



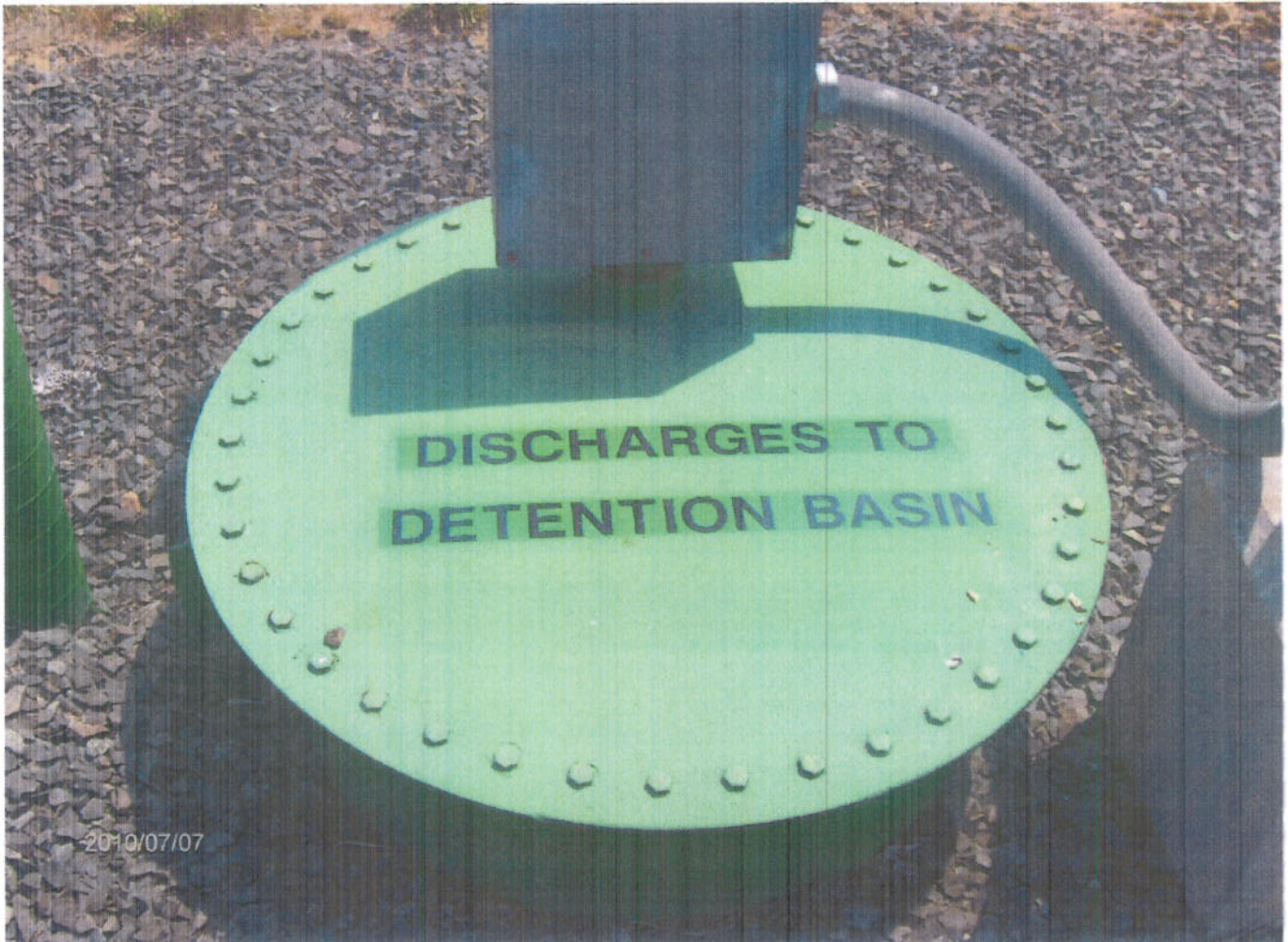
Another view showing the outfall and the mowing.

Oil and Water Separator #1 (OWS – 1)



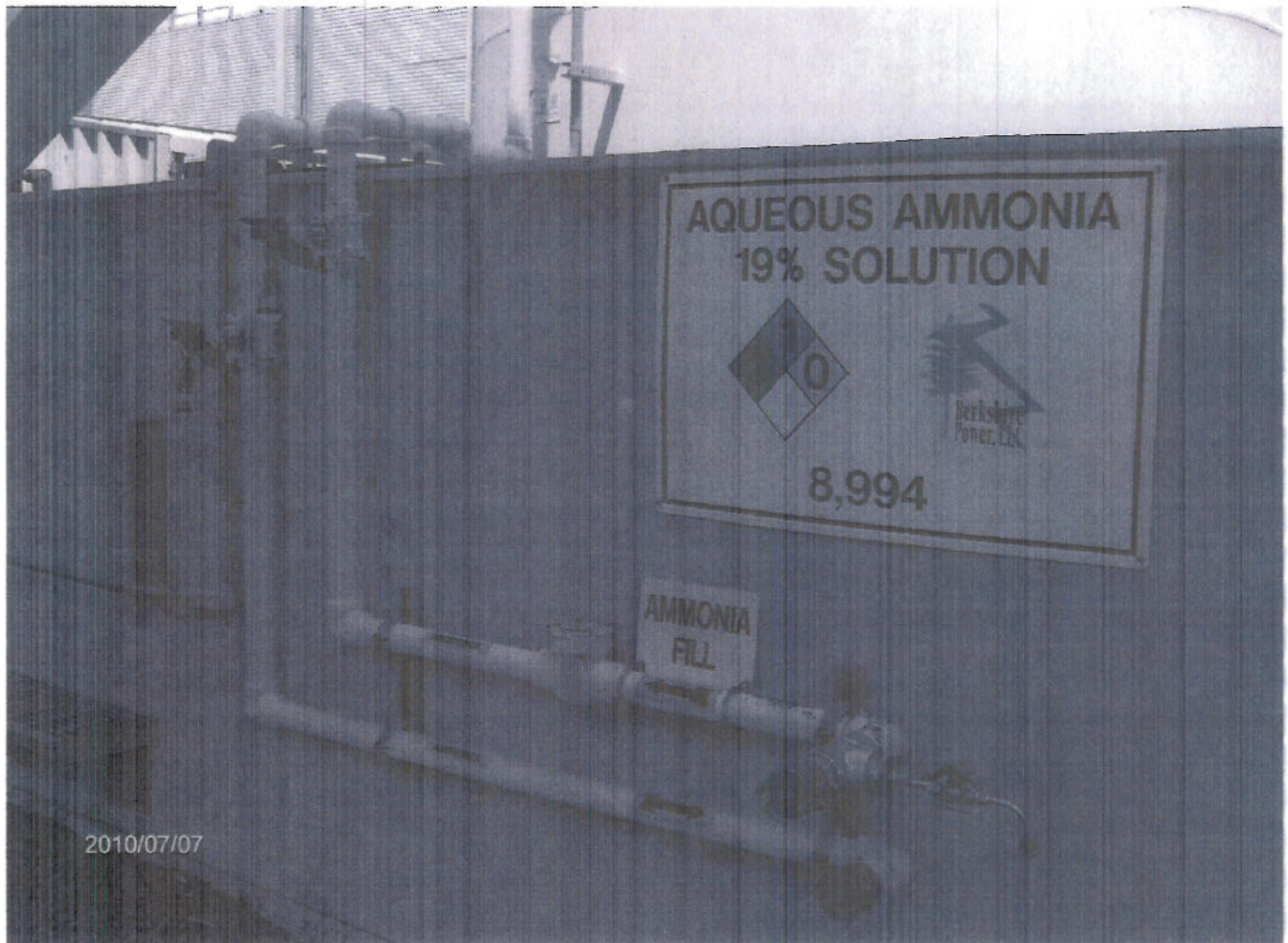
Showing labeling which identifies its discharge to the wetlands.

Oil and Water Separator #2 (OWS – 2)



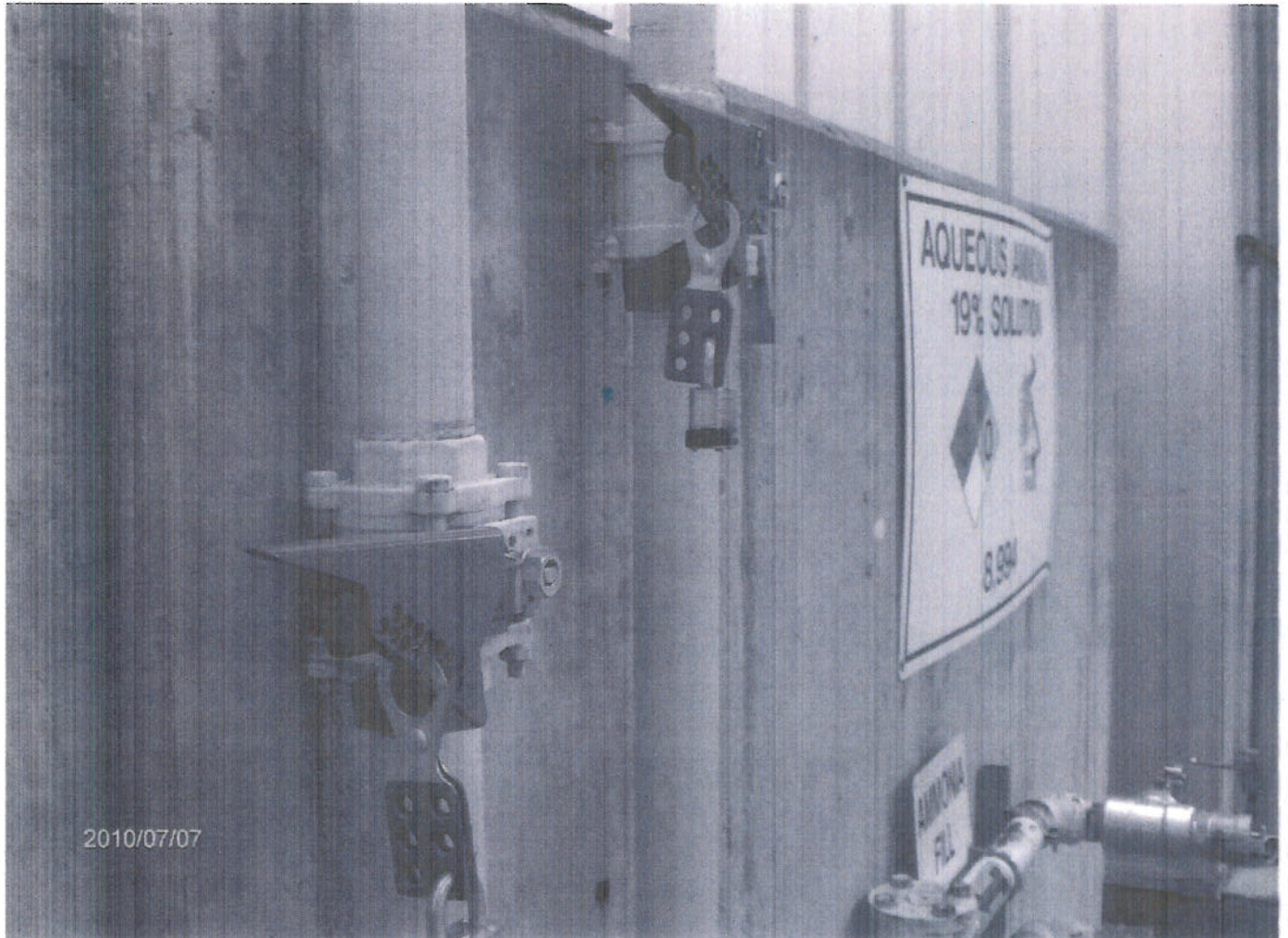
Labeled as discharging to detention basin.

Ammonia Tank



Locks applied to inlet and outlet isolation valves at Ammonia Tank.

Ammonia Tank

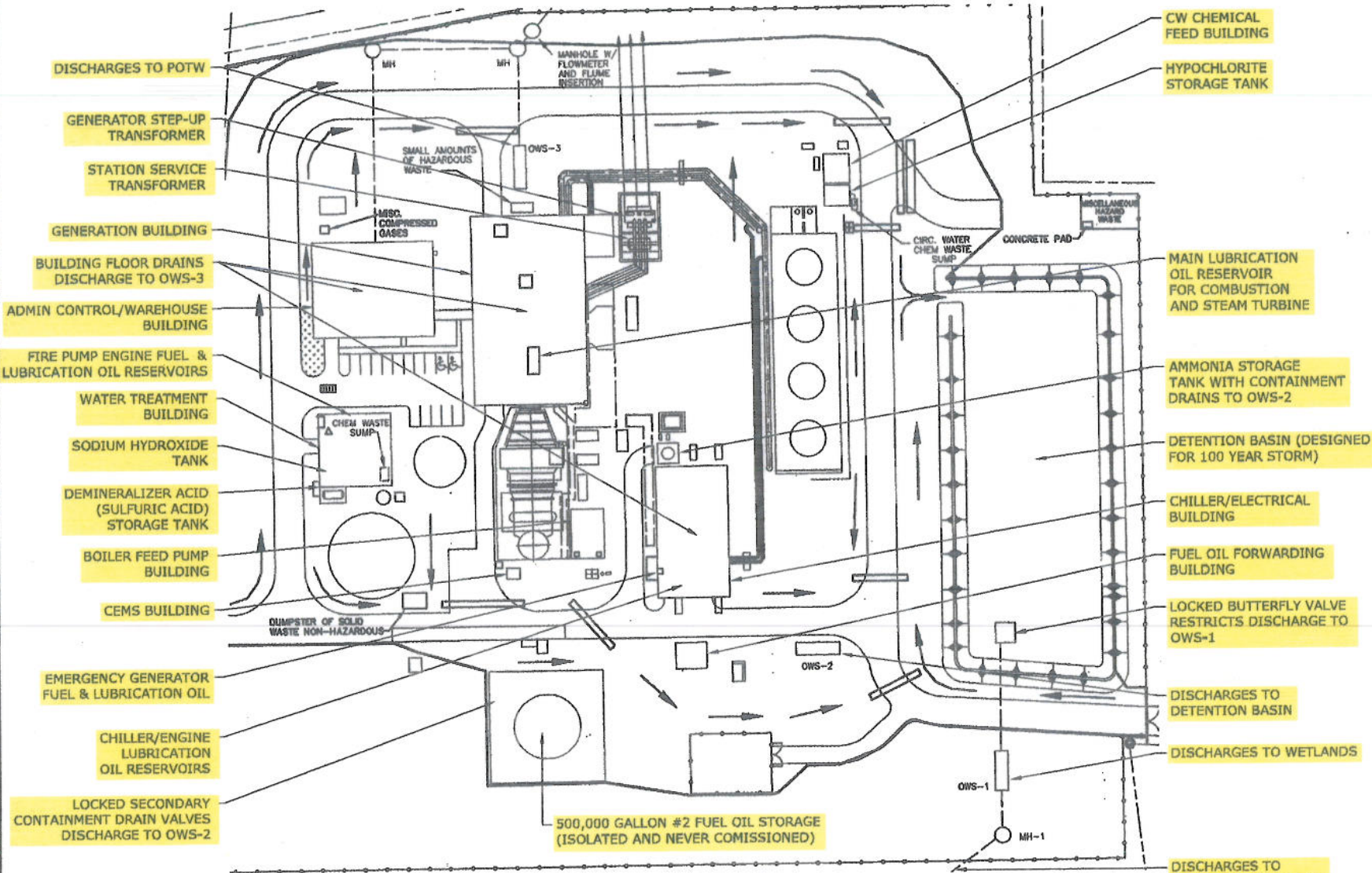


Close-up of locks on Ammonia Tank.

Building Floor Drains



An example of the stencils applied to all building floor drains.



Tighte & Bond Consulting Engineers 1000 Bridgeport Avenue Suite 300, Shelton, CT 06484 PH: (203) 925-8800 FX: (203) 925-8842 www.tighteandbond.com		Scale: No Scale Job No. 11-0471 Date: 02/16/2010 Drawn By: ADM	Date: Revision: Date: Revision: Date: Revision:	NORTH
Berkshire Power Company, LLC Agawam, Massachusetts		Sheet No: SK-1		
Site Plan				